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Chamber of
Maritime
Commerce

350 Sparks Street, Suite 704-A
Ottawa, Ontario, Canada K1R 7S8
Tel.: (613) 233-8779
Fax.: (613) 233-3743

Linking the Marine Community

January 27, 2003

Mr. Norman Mineta
Secretary of Transportation
c/o Docket Management Facility
USCG 2002 - 11288 - 3
U.S. Department of Transportation
Room PL 401
400 Seventh Street, S.W.
Washington, D.C.
20590-0001

Fax: 202-493-2251

Dear Sir:

Re: Great Lakes Pilotage Rate Increases – Notice of Proposed Rule Making as published in the Federal Register of January 23, 2003 (USCG 2002-11288)

The Chamber of Maritime Commerce (CMC) is a bi-national trade association that represents more than 125 organizations that rely on efficient and competitive marine transportation. Our membership is comprised of major American and Canadian shippers, ports and marine service providers, as well as domestic and international shipowners. Many of these organizations rely, either directly or indirectly, on the provision of competitive and efficient marine services in the Great Lakes; services such as those provided through the legislative monopoly of the US Great Lakes pilotage system. Given the significant, and excessive, rate increase proposed for the 2003-shipping season, the CMC is compelled to write to you today to voice our great concern regarding both the increase and the public comment process being used to address this Notice of Proposed Rule Making (NPRM).

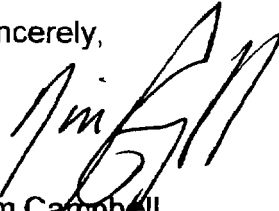
The Great Lakes marine community has faced a number of economic pressures and challenges in the last decade. Costs of doing business have risen while, in many cases, millions of tonnes of traditional Great Lakes' cargos - such as US and Canadian grain - have shifted to less expensive modes. Shippers, ports and carriers have responded by investing in new technologies, training and shore based infrastructure. These investments have made many in the Great Lakes marine sector more efficient and cost effective. It is in this light that the marine industry in the Lakes must now face a proposed US pilotage rate increase of up to 62%; an increase that could undermine the progress many in the Great Lakes have made over the years in ensuring they are doing their part in keeping the Waterway a competitive option for shippers and carriers alike.

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Chambre de commerce maritime

On behalf of our membership, the CMC will be participating throughout the public comment process as outlined in the January 23 NPRM document, a process that is scheduled to end on March 15, 2003. In consideration of the scale of the proposed increase cited in the January 23, 2003 NPRM; the wealth of data that must be thoroughly assessed; and, the impact these increases could have on the competitive position of US and Canadian Great Lakes ports, shippers and carriers, the CMC and its membership urge your department to extend the public comment period by 90 days.

Sincerely,



Jim Campbell
Vice President/General Manager

c.c. Rear Admiral Paul J. Pluta
Assistant Commandant
Marine Safety, Security and Environmental Protection
United States Coast Guard